

Topic Paper 6

Green Infrastructure

for the Crawley Borough Local Plan 2015-2030

November 2014



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Fig 1. Overall Green Infrastructure Map showing assets and opportunities

1.0 Introduction

- 1.1 This paper is part of the evidence base for the Crawley Borough Local Plan 2015 – 2030. It supports the council's approach to planning for green infrastructure which is detailed in the submission Local Plan policies:
- CH3: Normal Requirements of All New Development
 - CH6: Tree Planting and Replacement Standards
 - CH7: Structural Landscaping
 - CH8: Important Views
 - CH9: Development Outside the Built-Up Area
 - CH10 High Weald Area of Outstanding Natural Beauty
 - CH11: Rights of Way and Access to the Countryside
 - CH12: Heritage Assets
 - CH13: Conservation Areas
 - CH17: Historic Parks and Gardens
 - ENV1: Green Infrastructure
 - ENV2: Biodiversity
 - ENV3: Local Green Space
 - ENV4: Open Space, Sport and Recreation
 - ENV5: Provision of Open Space and Recreational Facilities
 - ENV8: Development and Flood Risk
- 1.2 Local Authorities are required to plan strategic development considering the impacts on existing infrastructure and the need for new infrastructure to service that development. The term 'green infrastructure' has evolved in order to recognise that 'green' elements of the environment are just as important as other types of infrastructure that support development, such as roads, schools, healthcare and transport. Elements of green infrastructure are also key considerations in discharging Local Authority duties to support sustainable development, biodiversity, and climate change adaptation.
- 1.3 The idea of networks is fundamental to planning and is applied to a wide range of activities. 'Green Networks' began as a way of adding value to open and green spaces in urban areas by protecting or creating green links between them. It was then recognised that regarding these linked spaces and networks as a multi-functional resource, particularly in terms of recreation, walking/jogging/cycling and biodiversity, also added value and helped prioritise resources to create multiple benefits. Now the desirability of making even wider connections in the interests of mitigating and adapting to the effects of climate change (e.g. 'habitat networks' for species redistribution) is recognised, and increasingly the shorthand 'green infrastructure' is being used to describe this.
- 1.4 The functions and benefits of green infrastructure are wide-ranging and it's the responsibility of the individual local authority to identify which are most important in the local context. Key functions of green infrastructure are often to conserve and enhance biodiversity, a sense of space and place in terms of the character and distinctiveness of an area and to support healthy living by increasing outdoor recreational opportunities for people. There is also evidence that green infrastructure can contribute to economic growth and regeneration through the improved health and productivity of the workforce, the image and attractiveness of the area, visitors and recreation and

economic and social dynamism through community cohesion¹. This can be achieved by maintaining existing benefits, increasing the amount of green infrastructure and improving the quality and connectivity.

Table 1: Green Infrastructure Assets

Green infrastructure assets:	
Accessible countryside in urban fringe areas	Green corridors for biodiversity and recreation
Land in agri-environmental and agricultural management	Scheduled Monuments, Historic Parks and Gardens and Historic Landscapes
Public rights of way, cycleways and other recreational routes	Registered commons and villages and town greens
Natural and semi-natural green space, Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), Sites of Special Scientific Interest (SSSI), Biodiversity Opportunity Areas (BOAs)	Waterways and waterbodies, including flooded quarries
Ancient woodland and other woodlands	Allotments, community gardens, urban farms, cemeteries, churchyards
Disused land with biodiversity value	Structural landscaping and Important Views
Areas of Special Local Character	
Local scale green infrastructure assets:	
Verges	Green roofs and walls
Small pockets of unused land	Street trees and Protected Trees
Private gardens	Streams and other small water bodies
Local trails, footpaths	

Green Infrastructure planning in Crawley

- 1.5 Crawley was designated as a new town in 1947 and was laid out according to 20th century quality of life principles which included many green spaces and landscaping integrated within the developed area. This included large parks, sports facilities, large and small amenity green space, structural landscaping along roads, and avoiding urban sprawl with a “tight” urban area and distinct boundary to open countryside. As a consequence, Crawley has much existing green infrastructure to protect and enhance.
- 1.6 In a local context, the Local Plan consultations have found that residents value green space for many types of recreation, formal and informal. Good access to these green spaces as well as their quality is very important to residents. Also important to residents is the overall green character of the town largely made up of extensive cover of mature trees and quality structural landscaping which provides the green setting within the urban areas. This is seen as one of Crawley’s greatest assets which has been retained and largely repeated as the town has grown.
- 1.7 New development will increase pressures on the borough’s landscapes and green spaces as well as presenting opportunities for enhancing and extending green infrastructure assets. For the town to develop and grow in a sustainable manner, retaining its character and residential amenity, it is important to ensure that green infrastructure is embedded in the planning process at the earliest stage.

¹ Microeconomic Evidence for the Benefits of Investment in the Environment (MEBIE) - review (Natural England, 2012)

- 1.8 Green infrastructure should not just be considered as an adjunct to new development. Connected networks of green spaces around, and through, new development should be treated as integral to the planning and design process, conscious of its place within wider green infrastructure networks.
- 1.9 Ensuring adequate and appropriate green infrastructure is delivered, managed and the benefits are maximised requires an integrated review of existing green infrastructure functions (biodiversity, flood management, rights of way, open space etc). An assessment of deficiency and need in relation to future growth and the aspirations and priorities of the town are required to determine where improvement should be focused.

Table 2: Local Plan Vision and Objectives for Green Infrastructure

Local Plan Vision for Green Infrastructure	
Crawley 2030: A Vision	<p>Crawley the place: <i>The rich heritage which has shaped what the town is today will be respected, protected and enhanced.</i></p> <p>Living in Crawley: <i>...new homes will be built...in locations which respect the town's unique development and design principles and preserve the most valued of the town's environmental features.</i></p> <p>Experiencing Crawley: <i>By 2030, Crawley will be a place that people want to visit, to have fun and spend their leisure time. Crawley's parklands and open spaces, its sporting, and leisure facilities along with its cultural offer will be enhanced, for the benefit of local people and visitors.</i></p> <p>Growing Crawley: <u>Enabling people</u> <i>People will be encouraged to stay physically and mentally fit. A strong road network will be complemented by a good public transport system.</i> <u>Growing the town</u> <i>Conserving natural resources to support future growth will be vital to the longevity of the town.</i></p>
Local Plan Objectives for Green Infrastructure	
Objective 2	To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings (SA Objective)
Objective 5	To meet as much of the agreed housing need as possible within the borough boundary, in light of constraints; by supporting the delivery of 258no. homes each year from 2015 to 2030.
Objective 6	To provide a good choice of well -designed housing in terms of tenure, type, size and location.
Objective 10	To ensure the protection & enhancement of valued open spaces.
Objective 13	To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
Objective 20	To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough (SA objective).
Objective 21	To adapt to the effects of climate change by reducing the negative consequences on people and/or the environment, such as reducing flood risk, future proofing the built environment and the positive management of natural resources (SA objective).

Structure and Purpose

- 1.10 The purpose of this paper is to show how the evidence base has led to the green infrastructure policies contained in the submission Local Plan. The approach to green infrastructure planning is an integrated one, bringing together information from a range of themes:
- Cultural Heritage
 - Landscape
 - Biodiversity
 - Open Space
 - Accessible Green Space and Rights of Way
- 1.11 Green infrastructure also has the potential to help us adapt to the impacts of climate change. For example through reducing severity of flood and drought and reducing the risks of overheating in urban areas through shading and evaporative cooling. This topic is covered in a standalone paper on climate change² but is also part of the evidence for Policy ENV1 Green Infrastructure. The opportunity for green infrastructure to help us adapt to climate is integrated into Section 7, to fully recognise to the value of sites and uncover opportunities to focus enhancements which provide multiple benefits.
- 1.12 Similarly, green infrastructure provides a very important function in relation to flooding and flood defences. The specific issue of flood risk within the borough is detailed in Crawley's Strategic Flood Risk Assessment (SFRA)³.
- 1.13 This topic paper sets out the existing local evidence and responses from public/stakeholder consultation stages that took place through the preparation of the Local Plan. This shows how the policies were shaped and are now worded in their current form. The reasoning behind the Local Plan policies is set out for each theme through sub headings:
- Policy context
 - Evidence base
 - Consultation summary
- 1.14 This Topic Paper should be read in conjunction with the following key evidence base documents published to support the Local Plan:
- Crawley Baseline Character Assessment (EDAW/AECOM, 2009) Core Document Library Reference: LP051
 - High Weald Management Plan (2014) Core Document Library Reference: LP058
 - Landscape Character Assessment (CBC, 2012) Core Document Library Reference: LP055
 - Historic Parks and Gardens Review (Sussex Gardens Trust, 2013) Core Document Library Reference: LP053
 - Crawley Open Space, Sport and Recreation Study (JPC, 2013) Core Document Library Reference: LP108

2.0 Cultural Heritage

- 2.1 Cultural heritage is the legacy of unique and irreplaceable attributes of a group or society that are inherited from past generations, maintained in the present and bestowed for the benefit of future generations. This places the

² Topic Paper 7: Climate Change (CBC, 2014) Core Documents Library Reference: LP016

³ Crawley Borough Council Strategic Flood Risk Assessment (CBC, 2014) Core Documents Library Reference: LP099

responsibility of conservation on the current generation. Cultural heritage includes tangible culture, such as buildings and landscapes, and natural heritage, which includes culturally significant landscapes and biodiversity. Natural heritage is, therefore, an important part of a society’s heritage, encompassing the countryside and natural environment which often attract visitors to an area. Heritage, therefore, includes cultural landscapes where natural features have cultural attributes. Listed buildings are not green infrastructure but can often strengthen the value of green infrastructure whereas ancient woodland, field boundaries, individual trees, historic parks and landscapes are classified as green infrastructure assets. This Topic Paper focuses on natural heritage for this reason although in the assessment of green infrastructure needs and opportunities (section 7) listed buildings and conservation areas are included where they add to the value of a green infrastructure asset.

- 2.2 Crawley was developed as a post-war New Town; built around the three existing settlements of Ifield, Three Bridges and Crawley. The developers of the new town retained many features of historic value and as a result of this, Crawley has a predominant character which incorporates buildings, features and areas from varying ages, all of which contribute to the town’s diverse and unique character.

Table 3: Natural Heritage Assets in Crawley

Formally Designated Heritage Assets:	
Scheduled Monuments	Conservation Areas (Worth and Ifield Village)
Local Non Designated Heritage Assets:	
Locally Historic Parks & Gardens	Archaeologically Sensitive Areas (although these can be equivalent to Scheduled Monuments ⁴)
Areas of archeological potential (derived from the Historic Environment Record)	
Undesignated assets:	
Ancient Woodland/Hedgerows, wooded shaws	Historic waterways, ponds, mill pools and moats

Natural Heritage Policy Context

- 2.3 Under the Planning (Listed Buildings and Conservation Areas) Act 1990, the council has a duty to determine which parts of their area are of special character or appearance which it is desirable to preserve or enhance. They must then designate those areas as Conservation Areas. Decisions relating to Listed Buildings and their settings must address statutory considerations of the Act (in particular sections 16, 66 and 72). Worth and Ifield Village Conservation Areas contain natural heritage whereas the remaining areas are urban and do not link so well to green infrastructure.
- 2.4 Crawley has four Scheduled Ancient Monuments; specific protection for these is provided under the Ancient Monuments and Archaeological Areas Act 1979.
- 2.5 A core planning principle of the NPPF is to “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”⁵. This is

⁴ National Planning Policy Framework, para 40 (DCLG, 2012)

⁵ National Planning Policy Framework, para 17 (DCLG, 2012)

expanded upon in NPPF Section 12: Conserving and enhancing the historic environment⁶.

Evidence Base

Crawley Baseline Character Assessment

- 2.6 This study⁷ was commissioned by the council to undertake an assessment of Crawley's character. In relation to green infrastructure the assessment recommended a rethink of the approach to amenity green space to encourage greater function and quality. It highlighted that Crawley's green setting: country parks; remnant moats; mill ponds; estate gardens; woodland corridors; and waterways, provide a distinctive and characterful quality.
- 2.7 The assessment also concluded that many of the New Town neighbourhoods have failed to make the best use of these spaces by developing housing which backs on to green areas creating poorly overlooked public spaces. It recommended that any future expansion of the town should learn from the missed opportunities of earlier development and focus on the importance of the landscape as a key to delivering attractive and distinctive neighbourhoods.
- 2.8 The assessment recommended further study to identify particular view corridors which should be protected across the borough to ensure that any new development does not negatively impact on the character that these views bring to existing areas.

Historic Parks and Gardens Study

- 2.9 This study⁸ was undertaken by the Sussex Gardens Trust in March 2013. Prior to this study a number of historic parks and gardens were locally designated but there was not sufficient evidence to support the designation or allow development proposals to be adequately assessed against them. The study recommended the retention and/or extension of a number of historic parks and gardens as well as the de-designation of two: Burleys Wood and Ifield Park.

Historic Landscape Characterisation

- 2.10 West Sussex County Council led on a historic landscape characterisation study⁹. This is an interpretation of the landscape showing how it has been influenced by both natural and human actions; activities such as farming, settlement and recreation have left behind physical traces that help to give individual parts of the landscape their own special character. It was completed in 2010 and the results, along with digital mapping, have been incorporated into both the East and West Sussex Historic Environment Records.

⁶ National Planning Policy Framework, para 126-141 (DCLG, 2012)

⁷ Crawley Baseline Character Assessment (EDAW/AECOM, May 2009) Core Document Library Reference: LP053

⁸ Historic Parks and Gardens Review (Sussex Gardens Trust, 2013) Core Document Library Reference: LP053

⁹ Sussex Historic Landscape Characterisation (West Sussex County Council, East Sussex County Council, Brighton & Hove Unitary Authority and English Heritage, 2010)

Local Plan Heritage Policies: Consultation Feedback

- 2.11 In May – June 2009, the council published 13 non statutory consultation topic papers covering a number of important issues, including heritage as part of consultation topic paper 3: Design and Heritage¹⁰.
- 2.12 Issues at this time included the lack of assessment of Crawley's heritage and whether more should be done to protect/improve heritage as the town changes. The potential direction at this stage was to:
- Review designations and possibly identify new areas or features.
 - Review heritage policies.
 - Set out potential conflicts between heritage assets and new development.
 - Investigate and seek agreement for an approach or approaches to physically renew the environment of weaker areas.
- 2.13 The responses to the consultation supported the identification, assessment and protection of positive features and heritage assets of importance to the town. There was also agreement that the council needed to set out how to manage the conflict between heritage assets and new development, and a suggestion that heritage properties within any new neighbourhoods should be saved/restored and put to good use wherever possible.
- 2.14 Following the May/June 2009 Issues and Options consultation the council considered the recommendations set out in the Crawley Baseline Character Assessment (2009) of the borough concerning positive and less positive areas to provide locally specific policies at the preferred strategy stage.
- 2.15 A new topic paper was issued as part of the further stage of Issues and Options consultation undertaken in 2012, reflecting the changes to the approach towards heritage since 2009 and asking stakeholders and residents questions to stimulate debate on what features/areas should be protected and/or improved. The response to this consultation highlighted the following:
- Support for the protection of Crawley's heritage.
 - The existing character vista and spaces between dwellings was considered as very important.
 - The retention of key spaces and features should be central to any design or heritage policies.
- 2.16 The council published a draft Preferred Strategy Local Plan¹¹ and invited residents, businesses and other stakeholders to comment in late 2012. In relation to the heritage function of green infrastructure, the draft Local Plan at this point set out policies for national and local heritage designations: important views, historic parks and gardens. The responses gave overall support for protection of the historic environment and heritage assets.
- 2.17 The Additional Sites Consultation was held in June 2013¹², and consulted upon recommendations to add and remove Local Historic Parks and Gardens following the completion of the Local Historic Parks and Gardens Study. An overarching summary of the consultation responses is contained within the

¹⁰ Shaping the future of Crawley: Core Strategy Review (CBC, 2009) Core Documents Library Reference: LP032

¹¹ Crawley Borough Council Local Plan 2014-2029, Preferred Strategy Consultation Draft (October 2012);

¹² Additional Sites Consultation: Site Maps Document, June 2013;

Statement of Consultation¹³. The responses to the recommendations are set out in the table below.

Area	% Yes	% No	% Don't know	Base Fig (no.)
Extension to Tilgate Park	90%	4%	6%	1297
Designation of Memorial Gardens	88%	6%	6%	1306
Designation of Goffs Park	81%	8%	11%	1292
Removing the designation to Burley's Wood	24%	47%	29%	1293
Removing the designation to Ifield Park	21%	55%	24%	1295

- 2.18 The majority of respondents did not support removing the designations; however, this majority was not overwhelming.
- 2.19 The council decided to proceed with the proposals set out in the consultation. It was considered that the reasons given by respondents for retaining Burley's Wood and Ifield Park were based on concerns regarding potential redevelopment rather than any evidence demonstrating their historic importance and, therefore, they did not alter the technical findings of the Historic Parks and Gardens report. Neither area had sufficient historic interest to retain the local designation. Therefore, it was believed that the designation of these two areas would undermine the robustness of the local designation and create unnecessary policy requirements on proposals in these areas, the character of which would continue to be protected by other policies within the Plan (including Policy CH3: Normal Requirements of all New Development and Policy CH6: Tree Planting and Replacement Standards).
- 2.20 The overwhelming support for the designation of the two new areas and one new extension confirmed the importance of these areas for their local value in addition to their technical heritage merit, and the consultation did not raise any concerns on the findings to question the strength of evidence for proceeding with the new designations.

Submission Local Plan

- 2.21 The submission Local Plan contains a number of policy changes since the preferred strategy consultation:

Policy CH12: Heritage Assets

An overarching policy that covers all heritage assets including natural heritage assets, requiring a Heritage Impact Assessment to ensure key features of significance are not lost.

Policy CH13: Conservation Areas

Adding the requirement that all development within Conservation Areas should individually or cumulatively result in the preservation or enhancement of the character and appearance of the area. This replaces the refusal if there are adverse changes or loss of significant features.

Adding retention of architectural scale as part of the development criteria, removing the need to recognise cohesive character and also the reference to banks created by drovers roads as a landscape feature.

¹³ Statement of Consultation, November 2014;

Adding that demolition will be considered on a case-by-case basis and pre-application discussions are encouraged for such proposals.

Policy CH17: Historic Parks and Gardens

The policy now lists the locally historic parks and gardens:

- Worth Park
- Land South of St Nicholas Church
- Broadfield Park
- Tilgate Park
- Goffs Park
- Memorial Gardens

Reference to “other Heritage Assets” has been removed as all are covered by Policy CH12: Heritage Assets.

3.0 Landscape

3.1 Crawley is a compact town within a landscape setting. The landscape within and surrounding Crawley’s urban area is an important resource with multiple functions such as recreation, cultural heritage, biodiversity, amenity and a place to live and work for some. The landscape within and adjoining the borough is characterised by the following:

- The key characteristics are woodlands with predominantly pastoral farmland beyond the urban area. The rolling landform combined with the extensive pattern of trees, woods and forests, creates a relatively enclosed landscape but with a small number of vantage points with panoramic views across the landscape and town.
- The High Weald AONB to the South beyond the A264/M23 is heavily wooded with a country park and good network of footpaths to the west of the A23 but limited public access to the east side.
- There are a number of golf courses surrounding Crawley and two country parks lie south of Crawley, Buchan and Tilgate Country Parks. Within the surrounding Country Parks, extensive long distance views to the wider area are possible due to the higher elevation and exposure, allowing views northward over the town and beyond.
- An extensive network of public rights of way and cycle paths provide a framework for pedestrian access and recreation to and within the countryside. These links are particularly strong to the west and north-west sides of Crawley where public rights of way run directly from the urban area out into attractive countryside.
- Amenity green spaces such as school playing fields, cemeteries and allotments, together with woodlands, other structural landscaping and many mature trees, urban parks provide ‘breathing spaces’ and form an important part of the character and appearance of the borough.
- Crawley’s landscape setting also provides a visual break between settlements, creating a sense of place. The gaps between Crawley/Horsham and Crawley/Gatwick provide a meaningful landscape to ensure recreation in a natural environment but also close to home.

Policy Context

- 3.2 The NPPF¹⁴ provides a clear context for Local Authorities to develop policies that are specific to the unique role and character of landscape areas. In summary this is:
- Preparing landscape character assessments integrated with assessments of historic landscape character;
 - Ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
 - Setting criteria-based policies against which proposals for any development on or affecting protected wildlife or geodiverse sites or landscape areas will be judged;
 - Giving great weight to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty;
 - Recognising the intrinsic character and beauty of the countryside;
 - Setting out the strategic priorities for the area (climate change, landscape, natural historic environment and supporting nature improvement areas).

Evidence Base

- 3.3 The Baseline Character Assessment (see para 2.6) focused on the area within the borough's built-up area boundary, excluding the Manor Royal business area. The assessment used a checklist based on the 'By Design' best practice guidance¹⁵ and comprised a desk top review of mapping data and historic records supported by on-site survey and analysis. The final study was published in May 2009 and highlighted features including strategic landscape and character areas, topography and views. The study work was used to inform policies relating to the quality of new development, trees, structural landscaping and views.
- 3.4 The Issues and Options consultation in early 2012 invited responses regarding what physical features made a positive contribution to the character of the town and should these be protected and, where possible, improved. The council has undertaken the baseline character study and a key issue was that existing policies may need to be reviewed to reflect the formal assessment of character, which may identify new areas or features of value. One option would be to consider how new and existing designations could manage change, e.g. structural landscaping, different character areas and important views.
- 3.5 In March 2010, the council completed the first stage of a Landscape Character Assessment focusing on landscape outside the built-up area boundary. This stage of the assessment mapped and described areas of distinctive character 'At Crawley', showing what makes one area different or distinctive from the other. Existing information was used as the landscape within Crawley is an extension of other wider character areas. Existing character areas defined at National, County level and from adjacent districts were refined to focus specifically on the areas within Crawley and further locally distinctive description was added. This was particularly the case for the two landscape character areas between Crawley and Gatwick and the north east of the town which have a large extent of countryside within the borough boundary. This stage was consulted as part of the Issues and Options Consultation in early 2012.

¹⁴ National Planning Policy Framework, para 97 (DCLG, 2012)

¹⁵ By Design – Urban Design and the Planning System (DETR/CABE, 2000)

- 3.6 For the preferred strategy consultation in late 2012 the full Landscape Character Assessment was published. The characterisation stage had created a more detailed understanding of Crawley's landscapes as a basis for setting out objectives, guidelines and opportunities for enhancement for each area based on consideration of character, quality (condition of features), value of the landscape and its sensitivity to change.
- 3.7 These judgements were published as an opportunity for stakeholders and residents to consider them and make representations. General support was given for the evidence base approach to land outside the urban area, although this was from a very small number of respondents.
- 3.8 The Landscape Character Assessment will be reformatted into the Green Infrastructure Supplementary Planning Document to assist developers in meeting the criteria-based Local Plan policy (CH9: Development outside the Built-Up Area).

Local Plan Landscape Policies: Consultation Feedback

- 3.9 In 2009, the consultation topic papers included topic paper 10: Countryside. This paper raised issues outside the built-up area such as the potential impact of proposed growth, in what circumstances new development would be harmful, and whether certain types of development should be encouraged. The unique character of Crawley's countryside and its role in defining the setting of the town were highlighted. At this stage it was recognised that the evidence base for Crawley's countryside was not sufficient enough for the local authority to be aware of the specific circumstances, needs and priorities of the countryside. The potential direction was therefore to undertake a Landscape Character Assessment. This would also help develop a criteria-based policy for proposals in Crawley's countryside, which was particularly important with the removal of the existing Strategic Gap designation that was no longer supported by national policy.
- 3.10 The responses to this consultation raised the importance of links within the urban area and out to the countryside for people and wildlife. One response recognised the limited countryside within the borough as a valuable asset, one encouraged parks/leisure use, and two were in support of undertaking a Landscape Character Assessment. Two respondents suggested tying it to an assessment of green infrastructure within the town.
- 3.11 In light of these comments and guidance in National Planning Policy Statement 7 the council undertook the Landscape Character Assessment (LCA) described above to shape criteria-based policy to sufficiently protect local landscapes. This also removed the need for a Strategic Gap designation which under national policy was seen as unduly restricting sustainable development¹⁶. The benefit of tying a LCA to an assessment of green infrastructure was noted by the council.
- 3.12 Following the Issues and Options stage, a baseline review of Crawley's landscape character was presented at the council's Local Development Framework Working Group. Support was given to proceeding with the LCA with members highlighting the importance of preserving a gap between Crawley and Gatwick to maintain their separate identities.
- 3.13 A new topic paper was issued as part of the further stage of Issues and Options consultation undertaken in 2012, reflecting the changes to the approach towards Green Infrastructure since 2009 and asking stakeholders

¹⁶ Planning Policy Statement 7, p14 (DCLG, 2004) now revoked and replaced by NPPF

and residents questions to stimulate debate on the vision for Crawley's countryside. This was aided by Stage 1 of Crawley's Landscape Character Assessment which set out what makes Crawley's landscape unique.

- 3.14 The consultation topic paper 3: Design and Heritage also formed part of the non statutory Issues and Options consultation in early 2012. The paper invited responses regarding what physical features made a positive contribution to the character of the town and asked whether these should be protected and, where possible, improved. A key issue was that existing policies may need to be reviewed to reflect the formal assessment of their character, which may identify new areas or features of value. One option was to consider how new and existing designations could manage change e.g. structural landscaping, different character areas and important views.
- 3.15 In summary, the responses to this consultation indicated that the value placed on green space by residents is considerable, from areas for just 'being there' to areas such as Tilgate Park with its many different functions. General responses to the topic papers are similar to the responses to the Issues and Options consultation undertaken in 2009. Support was expressed for policies that would protect and enhance green infrastructure, encourage the protection of long views into the countryside and maintain the quality of Crawley's mature trees.
- 3.16 Policies CH3 (part), CH4 and CH11 were developed further to address these matters within the Preferred Strategy Consultation Draft in October 2012. During the consultation on this document, a limited number of comments were received supporting the protection of features or objecting to areas being regarded as structural landscaping, the use of rear garden standards or the need for additional guidance regarding views. There was also a representation seeking a more robust approach to trees in the townscape.
- 3.17 The Crawley Borough Landscape Character Assessment¹⁷ was published alongside the Preferred Strategy consultation. This document set out objectives, planning guidelines and opportunities for enhancement for Crawley's landscapes. It shaped Preferred Policy CH12, a criteria-based policy to ensure that proposals respect Crawley's landscape character.
- 3.18 There were very few responses to this consultation relating to Crawley's landscape areas. Those received supported the landscape character approach but highlighted the 'sustainable development' definition in the NPPF.
- 3.19 In light of internal and external consultation responses and further thought in relation to the NPPF the following changes were made for the submission Local Plan:
 - Policy CH3 was expanded to include requirements for the retention of trees that contribute to amenity, the maintenance of new landscaped areas and a cross-reference to a new tree replacement policy (CH6). Rear garden space is important for the provision and retention of trees.
 - New Policy CH6: Tree Planting and Replacement Standards seeks mitigation that takes account of the reduction in visual amenity based on the size of the tree being lost rather than relying on a two for one replacement approach.

¹⁷ Crawley Landscape Character Assessment (CBC, Oct 2012) Core Document Library Reference: LP055

- Policy CH11: Strategic Views became Policy CH8: Important Views. Rather than one criteria for all identified views, the policy now identifies two separate types of view and their key features and specifies how these should be protected.
- In the preferred strategy, Policy CH12 listed appropriate types of development outside the Built-Up Area Boundary (BUAB) if they would not adversely affect the character of the countryside. The submission version removed this as it was felt that all land uses are appropriate outside the BUAB as long as the character of the countryside and Crawley's compact nature and attractive setting is retained.
- Requiring the use of local building materials was removed as it is not essential in retaining the attractive setting of Crawley.
- Description from criteria iv was removed as unnecessary wording and became criteria v.
- Criteria vii became vi and revised so that it applies to areas relatively undisturbed by noise and valued for their recreational or amenity value. This change acknowledged that not all of Crawley's landscape is sensitive to noise generating activities.
- The guidelines to ensure the role of each area/edge is recognised have been included within the policy.

3.20 The Additional Sites Allocation consultation (June/July 2013) did not include any new evidence or designations in relation to landscape areas. However, some sites considered for housing allocations were located in landscape areas. These were:

- East of Brighton Road
- Land East of Street Hill
- West of Ifield: Ifield Brook Meadows
- Land at Poles Lane
- Land East of Balcombe Road
- Gypsy and Traveller site options at Broadfield Kennels and Land North of Langley Walk

The council's position on these sites is contained in the SHLAA¹⁸ and Topic Paper 3: Housing Land Supply¹⁹.

4.0 Biodiversity

4.1 With an increasing population and the need for development, the impact on the natural environment is a key issue. The Natural Environment White Paper has highlighted that nature in England is highly fragmented and unable to respond effectively to pressures such as climate and demographic change. The government target is to move from net biodiversity loss to net gain by 2020²⁰, achieved through support for healthy, well-functioning ecosystems and coherent ecological networks. A key issue to be addressed is that not all of Crawley's wildlife is secure within protected areas and there is limited evidence of a coherent ecological network.

¹⁸ Crawley Strategic Housing Land Availability Assessment (CBC, 2014) Core Document Library Reference: LP079

¹⁹ Topic Paper 3: Housing Land Supply (CBC, July 2014) Core Document Library Reference: LP011

²⁰ Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (DEFRA, 2011)

Designated sites

- 4.2 Crawley has a number of locally designated sites both within and outside the built up area which are important to nature conservation. This includes 12 Sites of Nature Conservation Importance (SNCIs) which are designated for their local flora and fauna interest and value and 6 Local Nature Reserves which have wildlife and / or geological features that are of local importance. There are 193 hectares of Ancient Woodland within the borough and a significant number of large environmentally valuable trees throughout the town.
- 4.3 In 2010 Crawley Borough Council commissioned a report²¹ into the state of Crawley's Local Nature Reserves, Sites of Nature Conservation Importance and other locally notable sites. A list of management recommendations were proposed to improve each of the 14 areas. These sites are managed by Crawley Borough Council and The Gatwick Greenspace Partnership to conserve and enhance their wildlife interest.

Policy Context

- 4.4 Section 74 of the Countryside and Rights of Way Act 2000 empowers Government to issue a list of **species and habitats of principle importance** for biodiversity. This power is carried forward into the Natural Environment and Rural Communities Act 2006 which also places a duty on all public bodies to have regard to the conservation of biodiversity.
- 4.5 Two key pieces of legislation afford legal protection to a wide range of wildlife. The Wildlife and Countryside Act (1981) as amended, affords protection to many species and special protection to a more limited range of rare, endangered or easily persecuted species. A range of breeding birds such as kingfisher and barn owl, bats, some rarer butterflies, amphibians and reptiles all enjoy some degree of legal protection. The Conservation (Natural Habitats &c.) Regulations 1994 which were subsequently consolidated into the Conservation of Habitats and Species Regulations 2010 are derived from the European Habitats Directive. These regulations afford special protection to 'European protected species' some of which reside in Crawley.
- 4.6 As a public body, Crawley Borough Council has a duty to have regard to the conservation of biodiversity through the proper exercising of all its functions. This is a statutory function set out in section 40 of the Natural Environment and Rural Communities Act, 2006.
- 4.7 The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution. In summary:
- Moving from a net loss of biodiversity to achieving net gains for nature;
 - Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies;
 - Recognising the wider benefits of ecosystem services;
 - Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

²¹ Crawley Borough Council Sites of Nature Conservation Importance (SNCI) & Wildlife Sites Review (Dolphin Ecological Surveys, September 2010)

- Plan for biodiversity at a landscape-scale across local authority boundaries;
- Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.

Evidence Base

Biodiversity Opportunity Areas

- 4.8 Existing habitats should be conserved but it is widely accepted that conserving existing fragments is not adequate to stop the long term decline in biodiversity²².
- 4.9 The general approach to biodiversity, as set out in the Natural Environment White Paper, is to:
- Conserve what remains of the existing resource in good condition
 - Restore degraded examples of the existing resource
 - Create new habitat (to expand, buffer, link or provide stepping stones in the landscape).
- 4.10 Landscape-scale conservation involves identifying opportunities to expand, link and buffer key sites, as well as increasing the quality of the entire countryside for wildlife. This approach is vital to ensure our species can adapt to the challenge of climate change.
- 4.11 The Sussex Biodiversity Partnership works together towards achieving biodiversity targets. Biodiversity Action Plans (BAPs) and Biodiversity Opportunity Areas have been produced which represent the targeted landscape-scale approach to conserving biodiversity in Sussex. This includes the Urban BAP which highlights the rich biodiversity in Sussex's urban areas as well as the Deciduous Woodland, Lowland Heathland, Lowland Meadows and Undetermined Grassland BAPs.
- 4.12 The BAP habitats and related targets are now linked to Biodiversity Opportunity Areas which represent the greatest opportunities for habitat creation and restoration. This is to enable focusing of resources to where they will have the greatest positive conservation impact, and provide quality areas in which people want to live and work. The Biodiversity Opportunity Areas that are within Crawley are: Gatwick Woods, Grattons Park, Ifield Brook, The St Leonards Watershed, and Tilgate and Furnace Green.
- 4.13 These are shown on the Local Plan Map, conserved under Policy ENV2: Biodiversity and also provide the evidence to implement Policy ENV1: Green Infrastructure.

Nature Improvement Areas

- 4.14 In June 2011 the Natural Environment White Paper, *The Natural Choice: securing the value of nature* was published by the Department for Environment, Food and Rural Affairs (DEFRA). It announced the creation of Nature Improvement Areas (NIAs) to enhance and reconnect nature on a significant scale, where the opportunities and benefits justify such action. It is the responsibility of local partnerships to come together to form NIAs.

²² Natural Environment White Paper, *The Natural Choice: securing the value of nature* (DEFRA, June 2011)

- 4.15 Where Nature Improvement Areas are identified in Local Plans, the NPPF asks the local planning authority to consider specifying the types of development that may be appropriate in these Areas.
- 4.16 There are currently no NIAs within Crawley but reference is made to them in Policy ENV2: Biodiversity as development proposals should have regard to any NIA plans if and when they are recognised on a partnership basis.

Ancient Woodland

- 4.17 In 2010 *A revision of the Ancient Woodland Inventory for West Sussex* was published. The work was supported by Natural England and added to the national inventory. There are 193 hectares of Ancient Woodland within the Borough which is shown on the Local Plan Map and conserved under Policy ENV2: Biodiversity.

Local Wildlife Sites

- 4.18 These non-statutory sites make an important contribution to ecological networks²³ and are overseen by the Sussex Biodiversity Record Centre, West Sussex County Council, Natural England and Crawley Borough Council. In Crawley these sites are called Sites of Nature Conservation Importance (SNCIs) or Local Nature Reserves (LNRs).
- 4.19 Sites of Nature Conservation Importance (SNCI) are amongst the best sites for wildlife in the county²⁴. They are a comprehensive suite of local wildlife sites that are of high value for biodiversity, with habitats and species that are uncommon in the county and sometimes further afield.
- 4.20 SNCI Initiative which identifies and updates management plans for each site is led by West Sussex County Council in partnership with district and borough councils, The South Downs National Park Authority, Natural England, and the Sussex Wildlife Trust. The Initiative:
- manages an up-to-date suite of local wildlife sites, representing important areas of the county for wildlife;
 - actively seeks to conserve, enhance and restore SNCIs through engaging with landowners and others;
 - provides advice and support to land managers, including surveys, management advice and practical assistance with appropriate management;
 - works with local people and communities to facilitate SNCI conservation and provide learning opportunities;
 - integrates SNCIs into landscape-scale conservation work and contributes to restoration of ecological networks; and
 - monitors SNCIs and their special wildlife
- 4.21 A number of statutory Local Nature Reserves have been declared within the borough with agreement from Natural England under Section 21 of the National Parks and Access to the Countryside Act 1949. These sites are recognised under this designation as important for wildlife, education and/or public enjoyment. The main aim is to care for the natural features which make the site special.

²³ National Planning Policy Framework, para 117 (DCLG, 2012)

²⁴

https://www.westsussex.gov.uk/leisure/enjoy_west_sussex/wildlife_and_landscape/countryside_and_wildlife/conservation_biodiversity_and/sites_of_nature_conservation_i.aspx#

- 4.22 SNCIs and LNRs are shown on the Local Plan Map and conserved under policy ENV2: Biodiversity and also provide the evidence to implement Policy ENV1: Green Infrastructure.

Sites of Special Scientific Interest

- 4.23 There are no SSSIs within Crawley’s administrative boundary but there are two adjacent: Buchan Hill Ponds – next to Target Hill/Southgate (condition unfavourable but recovering) and Glovers Wood - West of Gatwick Airport (favourable condition). It is important that development within Crawley does not impact on the special interests of these sites in line with paragraph 118, bullet 2 of the NPPF.

Protected Species and Species of Principal Importance

- 4.24 European Protected Species are protected under the Conservation of Habitats and Species Regulations 2010 in addition to the Wildlife and Countryside Act 1981 (as amended). Of these species in Crawley there are populations of a range of bat species, water vole, common dormouse, and great crested newt.
- 4.25 The recent review of the national Biodiversity Action Plan has confirmed and expanded the national list of habitats of principle importance. The habitats have been mapped by the Sussex Biodiversity Record Centre and form the Biodiversity Opportunity Areas.

Table 4: Habitats and Species of Principle Importance found in Crawley

Habitats found in Crawley:	
Deciduous Woodland	Lowland Heathland
Lowland Meadows	Undetermined Grassland
Species found in Crawley:	
Grass Snake	Adder
Viviparous Reptile	Slow Worm
Great Crested Newt	Common Dormouse
European Water Vole	Hazel Dormouse
Field Cow Wheat	Common Lizard

- 4.26 The Sussex Biodiversity Record Centre map where these species have been identified within Crawley. This information can be used in the planning application process to determine whether habitat and/or species surveys are required. This requirement is set out in Policy ENV2 Biodiversity.

Local Plan Biodiversity Policies: Consultation Feedback

- 4.27 Topic Paper 11: Open Space, Recreation, Leisure and Greenways was published in 2009, and raised the issue that in recent years, the number and quality of open space sites has come under increasing pressure from both new development and maintenance budgetary constraints. To address this issue the preferred direction was to undertake a strategic review of all open spaces, sport and recreational facilities with the view to releasing underused, low quality, or duplicated sites. This would help the borough meet the requirement for developable land and replace the saved Local Plan policies and adopted Core Strategy policy with strict Crawley-specific standards for the retention of the remaining sites. The responses to this consultation raised the following issues:
- Ensure growth is designed in a sustainable manner with a multi-functional green network to ensure GI and biodiversity gains are delivered in an integral fashion.

- Detailed up to date ecological data should form part of the evidence base
 - Vitally important that urban biodiversity is recognised and encouraged
 - CBC should also recognise the Local Biodiversity Action Plans (BAPs) and targets which are applicable in the Crawley area.
 - A rich mosaic of well-connected habitats across a landscape is needed for wildlife rich, healthy environment. It is also important that there is permeability between the urban and rural areas of the borough so that access for people and wildlife movement is realised.
 - There is no mention of how wildlife sites will be protected from development. The importance of waterways as wildlife corridors should be recognised. Reference should also be made to green infrastructure.
- 4.28 In light of these comments and guidance in National Planning Policy the council decided to:
- Recognise BAPs at the next stage.
 - Set out how biodiversity sites will be protected.
 - Develop an approach to green infrastructure planning by recognising the various functions green space can perform and assessing how this can be protected/enhanced alongside growth.
- 4.29 As part of an additional revised Issues and Options consultation (from 19 January to 1 March 2012) residents, community groups, businesses and other stakeholders responded to questions set out in a revised Topic Paper 10: Green Infrastructure which reflected the changes since 2009. This paper brought together issues relating to landscape, open space and biodiversity under the umbrella of green infrastructure. Specifically for biodiversity the issues were the same as for the previous issues and options consultation but since then the Natural Environment White Paper had been published highlighting that nature in England is highly fragmented and unable to respond effectively to pressures such as climate and demographic change.
- 4.30 The preferred approach was to conserve and enhance biodiversity through a more strategic and integrated way recognising the mainly urban nature of the borough. These issues would be addressed through preparation of a green infrastructure plan.
- 4.31 The direct representations to the revised Issues and Options consultation covered the following specifically in relation to biodiversity:
- Encouraging a policy of seeking a net gain of biodiversity in all possible cases rather than no net loss because of the urban nature of the borough.
 - Encouraging a policy that requires a buffer zone for development near ancient woodland and Sites of Nature Conservation Interest (SNCI).
 - Request to update SNCI management plans which are outdated.
 - Strong support for developing green infrastructure policies identifying opportunities to enhance and develop new green infrastructure assets as well as protecting the most valued green space.
- 4.32 As part of the Preferred Strategy consultation, as well as accepting direct representations, the public were asked to indicate whether they agreed or disagreed with a number of draft planning policies that had been developed. These were presented in the format of a questionnaire. The statement relevant to biodiversity was:
- Development should be managed in such a way that it does not put Crawley's wildlife or natural environment at risk.*

- 4.33 The responses to the consultation have been documented in the preferred strategy consultation report²⁵ published in February 2013. In summary 135 people agreed with the statement above, 4 people disagreed and 7 neither agreed nor disagreed. Comments made regarding this draft policy tended to reinforce the need to protect the town's wildlife and natural environment. There were a number of comments received that talked about the importance of maintaining and protecting the town's trees.
- 4.34 The Additional Sites Allocation Consultation, undertaken in June 2013, did not include any new evidence or designations in relation to biodiversity. However, as some proposed development allocations were on open space some issues were raised in relation to biodiversity.
- 4.35 In light of internal and external consultation responses and the developing evidence base the following changes were made between Policy ENV12 of the Preferred Strategy Consultation Draft (Oct 2012) and Policy ENV2 of the submission Local Plan (July 2014).
- Clearly listing the hierarchy of sites that are important for nature conservation in line with NPPF guidance.
 - Including habitats/species recognised through legislation that affords them legal protection in line with NPPF guidance.
 - Removing the allowance of proposals that harm biodiversity if there is a clear need for such development; as this would not be NPPF compliant.
 - Providing clearer expectations for major development to encourage/enhance biodiversity.
 - Removing last paragraph as it is repeated elsewhere.

5.0 Open Space

Policy Context

- 5.1 In the National Planning Policy Framework specific guidance on open space is set out in paragraphs 73 – 77. In summary:
- Protection of open space unless it is clearly surplus to requirements, can be replaced, or where the alternative is for sports/recreation that outweighs the loss.
 - A requirement for robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision used to determine what open space, sports and recreational provision is required.
 - Identify for special protection green areas of particular importance to a local community.

Evidence Base

Open Space, Sport and Recreation Study

- 5.2 The council's previous Open Space Study was published in July 2008²⁶ following the adoption of the Council's Core Strategy in November 2007. Based on consultation with residents, the general recommendation in this study was to protect all open space. Many types of open space were poor quality and so new residential development could mitigate its impact through

²⁵ Crawley 2029 Preferred Strategy Consultation Report, February 2013;

²⁶ Open Space Sport and Recreation Study, PMP Ltd, (July 2008)

S106 contributions to enhance quality. The study did not provide any recommendations on specific sites but instead provided the tools to be able to assess the value of open space on a site by site basis as and when a development proposal is submitted. This reflects the Core Strategy Policy EN3²⁷ which protects open space unless assessments clearly demonstrate the land is surplus to requirements.

- 5.3 The Open Space Study 2008 did not seek to identify land surplus to requirements and so the onus has been on developers to undertake additional assessment to clearly demonstrate land as surplus to requirements, for example the applications at Principle Park, Manor Royal (CR/2012/0134/OUT) and Langley Green School (CR/2014/0046/FUL).
- 5.4 In 2010, work commenced to develop the PPG17 Assessment beyond identifying general quantity surplus/deficits to provide a greater understanding, not just of areas where there is an above average amount of open space, but whether that space was of value. This signalled a more proactive approach by the council to protect and enhance those sites of value and choose a way forward for low value sites: either, to increase its value as open space if possible, by improving quality and/or change to another type of open space that is needed. Failing this the site would be surplus to requirements as open space and therefore suitable for non-open space uses such as housing. It was felt that this approach would allow the council to positively plan to make the best use of land as part of the Core Strategy review. This approach was in accordance with national planning policy pre-NPPF and the Companion Guide to PPG17²⁸.
- 5.5 Much of the background research was completed by the council between 2010 and 2012 and at the same time recommendations from the 2008 study were developed. In early 2013, JPC Consultants were commissioned by the council to complete the assessment of the current and future needs for open space across the borough and JPC and Leisure and the Environment Consultants also undertook a Playing Pitch Study assessing the supply and demand for playing pitches across the borough²⁹. One of the key outcomes of these studies was to identify if there were opportunities to rationalise any types of open space to contribute to meeting housing need whilst ensuring residents have sufficient open space, taking account of population growth, to 2029. These studies were completed in May 2013 and helped form the site allocations consultation. In light of the Key Priorities Sections of the study the council considered the following open space sites as justifying further exploration into their potential for accommodating some level of development.
- Breezehurst Drive Playing Fields (housing and playing fields)
 - Bewbush West Playing fields (housing and open space)
 - Tinsley Lane Sports Pitches (housing and sports pitches)
 - Cherry Lane Playing Fields (housing and open space)
 - Land East of Brighton Road (housing and ecology)
 - Ewhurst Playing Fields (a new cemetery)
- 5.6 The consultation results are set out in the Additional Site Consultation - Housing Development Consultation Report and are summarised in the consultation section below.

²⁷ Crawley Borough Local Development Framework Core Strategy, October 2008 Revision (p36).

²⁸ Assessing Needs and Opportunities, A Companion Guide to PPG17, Kit Cambell Associates/ODPM (2002)

²⁹ A Playing Pitch Study for Crawley Borough Council, JPC Strategic Planning and Leisure, Leisure and the Environment, (May 2013)

- 5.7 It was recognised that further work was required as recommended in Section 9.7 of the open space study before any loss of open space could be confirmed for the submission stage of the Local Plan. This included site specific assessment of value, future development/population growth, the need for other types of open space and other considerations such as visual amenity value. This work was undertaken following the Additional Sites Allocation consultation to determine conclusively whether the sites were suitable for development and any mitigation/compensation required.
- 5.8 This further evidence is contained in the Sites Analysis appendix to the Open Space Sport and Recreation Study. The conclusions feed into Policy H2: Key Housing Sites and the related Topic Paper on Housing³⁰.

Local Plan Open Space Policies: Consultation Feedback

- 5.9 In 2009, the consultation topic papers included one on Open Space, Recreation, Leisure and Greenways. This paper raised the issue that in recent years, the number and quality of open space sites has come under increasing pressure from both new development and maintenance budgetary constraints.
- 5.10 To address this issue the preferred direction was to undertake a strategic review of all open spaces, sport and recreational facilities with the view to releasing underused, low quality, or duplicated sites to help the borough meet the requirement for developable land. This would replace the saved Local Plan policies and adopted Core Strategy policy with strict Crawley specific standards for the retention of the remaining sites. The responses raised in relation to open space were:
- The current policy approach of protecting sites unless proven to be surplus is still relevant.
 - Support for a limited release of some of the lower quality and poorly used sites to help meet the need for development land but only if properly evidenced. Support for an update of the current PPG17 study to provide appropriate standards of provision in the future.
 - Highlighting that poorly used or low quality sites are not necessarily surplus. Open space, whatever the quality or levels of usage, can provide an important link between habitats and can mitigate climate change impacts such as flooding and facilitate urban cooling.
 - Trees and open spaces running through the town are fundamental to the town design and need protection.
 - The existing PPG17 Assessment appears very thorough and could be used as a basis for a re-evaluation of Open Space against the Green Infrastructure criteria.
 - Some responses wanted protection of all green space.
 - Support for development which enhances access to open space or provides additional facilities.
- 5.11 In light of these comments and preferred direction the council decided to:
- Undertake a refresh of the 2008 PPG17 assessment.
 - Develop a Green Infrastructure Plan using the results of the PPG17 refresh to inform where enhancement/links can be made.

³⁰ Topic Paper 3: Housing Land Supply (CBC, July 2014) Core Document Library Reference: LP011

- Explore the potential for increasing green infrastructure through an Infrastructure Plan.
 - If possible, create a locally specific policy that values structural landscaping/amenity land that has visual value.
- 5.12 At the revised Issues and Options consultation in early 2012 a new topic paper for Green Infrastructure was issued reflecting the changes since 2009. The topic paper reflected progress on the developing evidence base:
- Review of open space, sport and recreation facilities.
 - Bringing together existing evidence of green infrastructure functions to form a strategic approach to green infrastructure which highlights where opportunities for multiple/high value benefits can be gained.
- 5.13 The responses from stakeholders mirrored the 2009 consultation whilst recognising that the council had taken on board the previous comments/suggestions. The consultation asked five questions to gain a clear understanding of which open spaces the community value and where they would like to see improvements. There were 85 responses which has shaped the green infrastructure plan and also defines whether any local green spaces could be designated.
- 5.14 Following this stage, the council then proceeded to publish a draft Preferred Strategy Local Plan³¹ that residents, businesses and other stakeholders were invited to comment upon in late 2012. The draft Local Plan at this point set out the approach to open space under policy ENV13: Open Space, Sport and Recreation.
- 5.15 As well as accepting direct representations, the public were asked to indicate whether they agreed or disagreed with a number of draft planning policies that had been developed. These were presented in the format of a questionnaire. The statement relevant to open space was:
- Should the town's open spaces be protected even though this will limit the number of houses that can be built in the future?*
- 5.16 The responses to the consultation have been documented in the preferred strategy consultation report³² published in February 2013. In summary 118 people agreed with the statement above, 16 people disagreed and 9 neither agreed nor disagreed. Comments strongly indicated that housing should not be built at the expense of the towns open spaces.
- 5.17 Further comments, in addition to those similar to previous consultations, include using CIL to improve open space that is run down rather than using them for development, suggesting provision of a multi-use open space network around the urban fringe with access into the town and out into the countryside, and encouragement of allotments from one stakeholder.
- 5.18 In light of the SHLAA sites and recommendations of the open space, sport and recreation study, the Additional Sites Consultation³³, held in June 2013, included some potential housing allocations on open space. These sites were potentially surplus as open space but required further assessment and public consultation before final consideration as part of the Submission Local Plan.

³¹ Crawley Borough Council Local Plan 2014-2029, Preferred Strategy Consultation Draft (October 2012);

³² Crawley 2029 Preferred Strategy Consultation Report, February 2013;

³³ Additional Sites Consultation: Site Maps Document, June 2013;

- 5.19 An overarching summary of the consultation responses is contained within the Statement of Consultation³⁴. Specifically in relation to open space comments suggested that respondents were very reluctant to see open green space, of whatever size, being used for housing development. Respondents were concerned about Crawley becoming too urban, that peoples overall health and wellbeing would be affected and there was a fear that once taken these areas would be lost forever. Results for specific sites are below:

Ewhurst Playing Fields (a new cemetery)

Overall people were divided about whether Ewhurst playing field was a good site for a cemetery. 49% of respondents did not agree with the proposal whilst 35% agreed, the remaining 16% didn't know whether a cemetery should be located on Ewhurst Playing Fields.

Breezehurst Drive Playing Fields

- 48% (569) of those respondents did not agree that housing should be developed on the Breezehurst Drive site.
- 39% (460) agreed with the proposal.
- 13% (159) respondents did not know whether the Breezehurst Drive site should come forward or not.

Bewbush West Playing fields

- 52% (621) of respondents did not agree housing should come forward on the Bewbush West playing field site.
- 33% (391) of the people who answered the Bewbush West question agreed that it should come forward as a housing development site in the Local Plan.

- 5.20 There were a few sites that needed further work done on them before the council could form an opinion on whether they were suitable for housing. Those on open space were:

Land East of Brighton Road

- Site should not be considered (374) 34%
- Site should be considered (364) 34%
- Don't know (344) 32%

Tinsley Lane Sports Pitches

- Site should not be considered 32% (350)
- Site should be considered 40% (432)
- Don't know 28% (305)

- 5.21 Some sites were considered but rejected as potential housing sites. The consultation asked whether the respondent agreed with the decision not to put them forward.

- 5.22 Those on privately owned sites, with no public access to the open space were:

³⁴ Statement of Consultation, November 2014;

Site name	Agree – site should not be included	Disagree – site should be included	Don't Know
Land at Poles Lane	565 (54%)	208 (20%)	273 (26%)
Land at Meldon	660 (61%)	145 (13%)	271 (25%)
Land East of Street Hill	563 (53%)	207 (19%)	304 (28%)
Land East of Balcombe Road	521 (48%)	309 (29%)	253 (23%)
Gas Holder Site	481 (45%)	301 (28%)	298 (27%)
West of Ifield (Ifield Brook Meadows)	697 (65%)	145 (14%)	227 (21%)

5.23 Those on publicly accessible open space were:

Site name	Agree – site should not be included	Disagree – site should be included	Don't Know
Cherry Lane Playing Fields	861 (78%)	111 (10%)	131 (12%)
West of Ifield (Ifield Brook Meadows)	697 (65%)	145 (14%)	227 (21%)

5.24 The open space study suggested that the oversupply of parks and recreation grounds in Langley Green could provide an opportunity for alternative uses at Cherry Lane Playing Fields. The site was however rejected for housing on the basis that it is a hub sports and recreation site which had potential for enhancement for sports provision, and has also issues with transport access and aircraft noise. The consultation response above shows that it had the most support for retention. There was also support for retention of Ifield Brook Meadows which was rejected due to its importance to the local community, as a wildlife resource, flood zone and historic character contribution as part of the Ifield Village Conservation Area. This is reflected in the proposed designation of the area as a Local Green Space as part of the same consultation.

5.25 Ifield Brook Meadows was chosen as a potential Local Green Space based on responses from previous consultations that highlight its value to the local community and the benefit from having an overarching designation which recognises the sum of its parts. 1,297 respondents answered the question relating to the protection of Ifield Brook Meadows (63% of the overall sample). There was overwhelming support for protecting this area with 83% (1,082) in favour.

5.26 The consultation also asked if there are any other areas of open space which should be protected. The sites that were highlighted most were Tilgate Country Park, Goffs Park, Buchan Country Park, Memorial Gardens, the Worth Way and Ifield Mill Pond. These were assessed as potential Local Green Spaces against the criteria in the NPPF taking into account the level of support from residents. However, it was felt that little benefit would be gained from designating the requested sites as Local Green Space as they are sufficiently protected by other designations/policy or by environmental constraints such as flood risk. One of the key guidance notes within the PPG is to consider whether any additional local benefit would be gained by designating a site as a Local Green Space when already similarly protected.

6.0 Access (bridleways, cycle routes, footpaths and waterways)

6.1 This includes non motorised routes for walking, cycling and horse riding that can provide vital connections within the green infrastructure network. Crawley's Rights of Way network is an important resource across the borough, providing immediate and local access for communities to the countryside and landscapes on their doorstep, as well as providing sustainable connections to services such as train stations, workplaces and shops.

6.2 Cycling and walking are the most sustainable forms of transport that can produce the following benefits:

- Improving human health and wellbeing through exercise and recreation.
- Creating opportunities for leisure and tourism
- Easing traffic congestion and decreasing air pollution

Policy Context

6.3 The National Planning Policy Framework guidance on rights of way seeks to maximise the use of walking through the location and design of new development. This includes safe and accessible developments, containing clear and legible pedestrian routes and high quality public space, which encourage the active and continual use of public areas. Opportunities should also be sought through new developments by adding links to existing rights of way networks including National Trails.

6.4 The Defra Rights of Way Circular (1/09) also contains guidance on the consideration of rights of way in association with development.

Evidence Base

6.5 The Landscape Character Assessment (LCA) and Rights of Way Improvement Plan (RoWIP) provide a good understand of Crawley's public rights of way.

6.6 Overall Crawley has an extensive network of public rights of way and cycle paths that provide a framework for pedestrian access and recreation to and within the countryside around Crawley. Key findings from the LCA include:

- Strong links to the west and north-west sides of Crawley where public rights of way run directly from the urban area out into attractive countryside.
- Opportunities for pedestrian access from Crawley to the countryside to the east and south east of the town are limited where the M23 and A264 provide a physical and psychological barrier to pedestrian access to the countryside.
- Where roads or footpaths cross over the M23 on the east of Crawley, pavements tend to run up to the bridge crossings and then stop, leaving pedestrians to walk on the road or grass verges.
- Crawley has one long distance route - the Worth Way, a 7 mile shared-use route, from Three Bridges to East Grinstead. It can be accessed from Three Bridges Train station along the Worth Way SNCI. Access over the M23 into the countryside is provided further south from Worth Conservation Area.

6.7 The Countryside and Rights of Way Act 2000 required all highway authorities to produce and publish a Rights of Way Improvement Plan (RoWIP). West Sussex County Council now has a RoWIP which assesses present and likely

needs of users, opportunities provided by PRow, and accessibility to blind and partially sighted persons and others with mobility difficulties. Key issues for Crawley include maintenance, safety, access issues such as the need to upgrade to multi-use paths and circular routes, the generally fragmented nature of PRow in Crawley, and the threat of losing PRow to development.

- 6.8 Opportunities for enhancement are identified in the Landscape Character Assessment and Public Rights of Way Improvement Plan.

Local Plan Access Policies: Consultation Feedback

- 6.9 In 2009, the consultation topic papers covering transport, countryside, and open space, recreation and greenways all dealt with the crosscutting issue of Access. Key issues included:

- The ability to retain the countryside surrounding Crawley as attractive open space that residents want to access.
- Crawley's network of green spaces and corridors coming under pressure from development need and budgetary constraints.
- The need for new development to contribute to sustainable transport modes.

- 6.10 The preferred direction relating to access was to:

- Review open space with one outcome being the protection of valued spaces.
- Undertake a Landscape Character Assessment highlighting important links to the countryside and opportunities to improve access to and within the countryside.
- Encourage sustainable modes of transport as well as dissuading unsustainable modes of transport.

- 6.11 The responses to this initial consultation in relation to access were:

- Encouraging development to incorporate cycle routes.
- The need for better cycle paths and cycle racks at local shops within the town centre
- Encouraging footpaths, bridleways, and possibly information centres.
- Major new development on Crawley's boundary should integrate countryside access and rights of way.

- 6.12 In light of these comments the council agreed to progress with the preferred direction as outlined above.

- 6.13 The additional revised Issues and Options consultation in early 2012 included issuing a new Green Infrastructure paper and a revised Transport paper reflecting changes since 2009. These topic papers incorporated progress on the developing evidence base:

- Highlighting through the Landscape Character Assessment where there is good access between the urban/rural areas and where it could be improved.
- Ongoing review of open space, sport and recreation facilities.
- Bringing together existing evidence of green infrastructure functions to form a strategic approach to green infrastructure which highlights where opportunities for multiple/high value benefits can be gained.

- 6.14 The responses from stakeholders generally mirrored the 2009 consultation but specifically included:

- More and improved cycle lanes.
 - Well maintained pavements.
 - Accessibility to urban green space which links into nearby countryside.
 - Support for the protection and enhancement of public rights of way.
- 6.15 Following this stage, the council then proceeded to publish a draft Preferred Strategy Local Plan³⁵ that residents, businesses and other stakeholders were invited to comment upon in late 2012. This document contained draft planning policies and principles to help shape the future of the town. The draft Local Plan at this point set out the approach to access in the following policies:

CH12: Development Outside the Built-up Area

This policy does not mention accessibility but does require consideration of the Landscape Character Assessment which highlights strong/weak areas of accessibility.

Policy CH3: Normal Requirements of All New Development

“...safe and proper use with regard to access, circulation and manoeuvring, vehicle and cycle parking...”

“Be based on a thorough understanding of the significance and distinctiveness of the site and its immediate and wider context and demonstrate how attractive or important features which make a positive contribution to the area including...footpaths and rights of way...would be integrated and enhanced.”

Policy IN4: The Location and Provision of New Infrastructure

Locating local infrastructure to neighbourhood centres to encourage pedestrian and cycle access.

Policy ENV13: Open Space, Sport and Recreation

Requiring development of open space to be clearly demonstrated as surplus ensures that valued green space is retained which encourages walking and cycling.

- 6.16 The responses to the consultation have been documented in the preferred strategy consultation report³⁶ published in February 2013. Comments in addition to those similar to previous consultations include requesting cycle lanes in Manor Royal Business District.
- 6.17 The Additional Sites Consultation³⁷, June 2013, consulted upon additional sites for development and/or protective designations. Once more, residents, businesses and other stakeholders were asked to consider a number of potential designations and allocations.
- 6.18 In light of the SHLAA sites and the findings of the open space, sport and recreation study the consultation included potential housing allocations on open space. A number of responses to these emphasised the importance of cycling and walking in these spaces. If the allocations were to go ahead responses suggested enhancements to footpaths and cycleways within and linking to other routes/areas.

³⁵ Crawley Borough Council Local Plan 2014-2029, Preferred Strategy Consultation Draft (October 2012);

³⁶ Crawley 2029 Preferred Strategy Consultation Report, February 2013;

³⁷ Additional Sites Consultation: Site Maps Document, June 2013;

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- 6.19 The consultation stages and other evidence have led to the formation of policies that protect and enhance access:

Policy CH1: Neighbourhood Principle

The neighbourhood principle policy at the submission stage places greater emphasis on the principle as way of encouraging facilities that meet every day needs within walking distance.

Policy CH9: Development Outside the Built-Up Area

The Landscape Character Assessment highlights where public rights of way can be improved alongside development proposals

Policy CH11 Rights of Way and Access to the Countryside

This policy implements the NPPF requirement to protect and enhance PRoW into a development management policy and also links to the Public Rights of Way Improvement Plan which sets how and where PRoW can be enhanced.

Policy EC3: Manor Royal

The criteria for proposals within Manor Royal include the need to comply with the Manor Royal Design Guide SPD. This SPD requires proposals to demonstrate how cycle/pedestrian routes improvements have been explored.

Policy ENV3: Local Green Space

The proposed designation of Ifield Brook Meadows as a Local Green Space safeguards the excellent recreational links into the countryside in this area as highlighted in the Landscape Character Assessment and consultation responses.

Policy IN4: Car and Cycle Parking Standards

New development will be permitted where an appropriate amount of cycle parking is provided to meet its needs.

7.0 Green Infrastructure Assets and Opportunities

- 7.1 This section sets out the overall approach to green infrastructure which has shaped Policy ENV1: Green Infrastructure.
- 7.2 There are two guidance documents that have been used to develop an approach to green infrastructure; these are: the South East Green Infrastructure Framework (2009) which was produced by Land Use Consultants on behalf of a regional partnership of organisations; and Natural England published Green Infrastructure Guidance in 2009. Neither of these documents have been reviewed because national guidance on green infrastructure did not change when the National Planning Policy Guidance was published in 2012.
- 7.3 Under the Conserving the Natural Environment section of the NPPF local planning authorities are required to:
“set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.”
- 7.4 Green Infrastructure is defined in the NPPF as:

“A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”

- 7.5 Creating, protecting and enhancing the network of green space in Crawley is reflected in Policy SD1: Presumption in Favour of Sustainable Development which seeks to protect, enhance and create opportunities for Crawley's unique green infrastructure.
- 7.6 The preceding sections cover the themes which make up the functions of Crawley's green infrastructure. A clear thread that can be seen from the summaries of national policy, consultation responses and other evidence is that spatially, green space serves a number of functions which should be fully recognised to properly value sites and also uncover opportunities to focus enhancements which provide multiple benefits.
- 7.8 To achieve this, the evidence covering the various functions of green infrastructure needed to be completed then brought together. This created a strategic and integrated approach to delivering environmental and quality of life benefits alongside development.
- 7.9 The first stage was to set out the green infrastructure assets and opportunities in the borough and map them. The Green Infrastructure Assets and Opportunities Map defines the town's network of green spaces and also maps opportunities where they have been identified through the evidence base.
- 7.10 The green infrastructure network for Crawley shows areas where maximum potential exists for the delivery of a multifunctional network of green infrastructure. The network shows key areas and corridors where existing GI assets should be protected and enhanced and new GI created. Land use changes in the area should deliver a net benefit to the GI network.
- 7.11 Fig 1 shows the overlay of opportunity maps showing where the greatest areas of protection, enhancement and creation of multi-functional green infrastructure.
- 7.12 Alongside the Local Plan a Green Infrastructure Supplementary Planning Document (SPD) will assist applicants in making successful applications which conserve and enhance green infrastructure in line with Policy ENV1: Green Infrastructure Network.

Figure 1: Green Infrastructure Assets and Opportunities Map

